## Federal Defenders OF NEW YORK, INC.

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## Via ECF

The Honorable Jennifer E. Willis United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Guzman</u> 24 Mag. 2044 (UA)

Dear Judge Willis,

Jemifer E. Willis

This request is GRANTED. SO ORDERED.

ØENNIFER E. WILLIS United States Magistrate Judge

June 7, 2024

I write with the consent of the Government to respectfully request that the Court modify the conditions of Mr. Guzman's personal recognizance bond to permit two of his cousins to cosign as financially responsible persons, in place of one of his siblings.

At Mr. Guzman's May 31, 2024 remote bail argument, the Court released Mr. Guzman directly from the hospital subject to certain conditions, including that his personal recognizance bond be co-signed by his girlfriend (who was present in court), as well as two financially responsible persons to include at least one sibling. *See* Docs. 7, 8. Mr. Guzman's girlfriend executed the bond that day, and Mr. Guzman (despite not being able to put weight on either of his broken feet and despite not having a wheelchair) reported as directed to the courthouse on the morning of Monday, June 3, 2024 to be processed by the Marshals and appear at Pretrial Services.

After further conversations with Mr. Guzman and his family, however, our office has concluded that two of Mr. Guzman's cousins would be better qualified to co-sign on his bond than his siblings, as the Court originally ordered. Both cousins are employed, have no criminal records, and have been interviewed and approved by the Government. Accordingly, we respectfully request that the Court modify the conditions of Mr. Guzman's bond to permit two of his cousins to sign as financially responsible persons in place of his siblings.

Respectfully submitted,

/s/

Neil P. Kelly Assistant Federal Defender (212) 417-8744

cc: AUSA William Kinder